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Lead Counsel for Plaintiffs and the Class

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

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IN RE WINSTAR COMMUNICATIONS)	Master File No.
SECURITIES LITIGATION)	01 Civ. 3014 (GBD)
)	
This Document Relates To:)	
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All Actions)	
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_____)	

**NOTICE OF UNOPPOSED MOTION FOR PRELIMINARY APPROVAL
OF SETTLEMENT, APPROVAL OF NOTICE TO SETTLEMENT CLASS
AND CERTIFICATION OF THE SETTLEMENT CLASS
FOR SETTLEMENT PURPOSES ONLY**

PLEASE TAKE NOTICE, that, upon the memorandum of law in support hereof, and accompanying declaration of Ralph M. Stone, and the exhibits thereto, and upon all prior papers and proceedings here, the undersigned hereby moves this Court for an Order, pursuant to Rule 23(e) of the Federal Rules of Civil Procedure: (i) preliminarily approving the proposed settlement herein between plaintiffs and defendant Grant Thornton LLP; (ii) conditionally certifying for settlement purposes only the Class as defined in the Stipulation of Settlement; (iii) directing notice of the proposed settlement as set forth in the accompanying proposed order; (iv) setting a hearing for final approval of the proposed settlement; (v) setting a schedule for various

administrative and other matters associated with the proposed settlement; and (vi) granting such other and further relief as this Court deems appropriate.¹

Defendant Grant Thornton LLP has stipulated for settlement purposes only to the certification of the Class, the appointment of Lead Plaintiffs as Class Representatives, and the appointment of Lead Counsel as Class Counsel.

Defendant Grant Thornton LLP does not oppose this motion.

WHEREFORE, Plaintiffs respectfully request that the Court enter an Order in the form of the [Proposed] Order Preliminarily Approving Proposed Settlement and Providing for Notice, attached hereto.

Dated: July 12, 2013

Respectfully submitted,

STONE BONNER & ROCCO LLP

By: /s/ Ralph M. Stone
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Lead Counsel for Plaintiffs and the Class

¹ The proposed Settlement Class is defined as follows: All persons and entities that during the period from March 10, 2000 through and including April 2, 2001 (the "Class Period") purchased or otherwise acquired the common stock, bonds, or other securities publicly issued by Winstar Communications, Inc. Certain persons and entities are excluded from the class as set forth in the [Proposed] Order attached hereto.